

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**GUILLERMO DE LA GARZA AND  
VERONICA DE LA GARZA**  
*Plaintiffs,*

v.

**GEOVERA SPECIALTY INSURANCE  
COMPANY**  
*Defendant.*

§  
§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 1:16-CV-00187**

**AGREED MOTION TO DISMISS**

NOW COME Plaintiffs, GUILLERMO DE LA GARZA, VERONICA DE LA GARZA and Defendant, GEOVERA SPECIALTY INSURANCE COMPANY, in the above-entitled and numbered cause, and file this Agreed Motion to Dismiss respectfully asking this Court to dismiss Plaintiffs' complaint with prejudice as per the Plaintiffs' request. (*See Affidavits of Guillermo de La Garza and Veronica De La Garza attached hereto as Exhibit "A" and "B"*).

**WHEREFORE, PREMISES CONSIDERED,** Movants pray that the Court enter an Order Dismissing the case with prejudice, and for such other and further relief that may be awarded at law or in equity.

Respectfully submitted,

**WILLIAM J. MCCARTHY, P.L.L.C.**  
3501 W. Alberta Rd.  
Edinburg, Texas 78539  
(956) 618-9884 Telephone  
(956) 618-9974 Telecopier  
[william@wjmpllc.com](mailto:william@wjmpllc.com)  
[laura@wjmpllc.com](mailto:laura@wjmpllc.com)

By: //s// William J. McCarthy

William J. McCarthy  
Texas Bar No. 13372500  
Fed ID#: 2444

**ATTORNEY FOR PLAINTIFFS**

AND

**THOMPSON, COE, COUSINS & IRONS, LLP**

700 N. Pearl Street, 25<sup>th</sup> Floor

Dallas, Texas 75201

(214) 871-8200 Telephone

(214) 871-8209 Fax

By: //s// Adrienne H. Nelson w/permission

Rhonda J. Thompson,

State Bar No. 24029862

Southern District No. 17055

Adrienne H. Nelson

State Bar No. 24069867

Southern District No.: 2276091